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*Attorneys Lead Plaintiff Trigon Trading Pty. Ltd.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:  
  
ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF REED R.  
KATHREIN IN OPPOSITION TO  
MOTION FOR DISTRIBUTION OF  
ATTORNEYS' FEES**

Date: N/A\*  
Time: N/A\*  
Courtroom: N/A\*  
Judge: Hon. Richard Seeborg

\* The Court's September 25 Order (ECF no. 268) Vacated The October 29, 2020 Hearing

I, Reed R. Kathrein, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am admitted to practice law before all of the courts of the State of California and I am admitted as counsel in this Action. I am a partner of the law firm Hagens Berman Sobol Shapiro LLP (“Hagens Berman”), counsel for Lead Plaintiff Trigon Trading Pty. Ltd. (“Trigon”). I respectfully submit this declaration in advance of the Settlement Conference scheduled for November 19, 2020.

2. I have personally participated in, overseen, and monitored the prosecution of this Action, and have otherwise been kept informed of developments in this Litigation by attorneys working with me and under my supervision. Thus, if called upon, I can testify to the matters set forth herein.

3. As counsel for Trigon, my firm was involved in all aspects of the litigation and its settlement.

4. I believe Trigon’s allocation of the attorneys’ fee portion of the settlement fund accurately reflects our respective plaintiffs’ firms’ relative contributions to the result achieved.

5. I have never told or suggested to Hung Ta that Trigon would propose an allocation that would result in his group receiving more than 25% of the total fees, nor am I aware of anyone else (*i.e.*, other than Hung Ta) proposing such an allocation of fees.

6. At no point have I or anyone at my firm denied to Hung Ta (or anyone else in his group) that Hagens Berman, Block & Leviton LLP, Robbins Geller Rudman & Dowd LLP, and Taylor-Copeland Law were working together. To the contrary, we stated in open court—in both this Court and the state court—that we were cooperating.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 7th day of October 2020, at Berkeley, California.

By: /s/ Reed R. Kathrein  
REED R. KATHREIN